

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOHN DOE,

*Plaintiff,*

v.

THE UNIVERSITY OF TEXAS M.D.  
ANDERSON CANCER CENTER, et al.,

*Defendants.*

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CIVIL ACTION NO. 4:21-cv-01356

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**JOINT MOTION FOR ENTRY OF AGREED ORDER AUTHORIZING DISCLOSURE**

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TO THE HONORABLE U.S. DISTRICT JUDGE GEORGE C. HANKS, JR.:

Plaintiff and Defendants jointly file this motion requesting the Court to enter the attached Agreed Order Authorizing Disclosure. In support, the parties show the following:

Defendants have within their custody or control certain documents that may be confidential and/or prohibited from general disclosure by law. *See, e.g.,* 20 U.S.C. § 1232g; 34 CFR Part 99. These documents may be useful to one or more parties in supporting their claims and defenses in this case. For example, some of the documents arguably include student records or other sensitive documentation relating to Li Cai, an individual who is integral to Plaintiff's factual allegations and claims in this case. *See* ECF No. 13 (Pl.'s 2d Am. Compl.) *passim*. Some of the documents may also include sensitive information relating to other individuals and implicating additional privacy concerns. Because the law arguably requires Defendants to produce the documents to Plaintiff only upon order of this Court, with appropriate confidentiality designations and protections, the parties jointly request the Court to enter the attached agreed order. The parties have conferred and agreed on the language of the order. The attached order, along with the Court's standard protective

order (being filed simultaneously under separate motion), will facilitate the production and protection of these sensitive documents. Ms. Cai has been separately notified of the intention to produce her student records in this case, pursuant to the federal laws cited above.

Respectfully submitted,

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/s/ Eddie M. Krenek (by permission)

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*Counsel for Defendants*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on January 5, 2024, I communicated with Ed Krenek, counsel for Plaintiff, who informed me that Plaintiff agrees with the relief sought and joins in this motion.

/s/ Benjamin S. Walton  
**BENJAMIN S. WALTON**  
Assistant Attorney General

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2024, a true and correct copy of this document was electronically filed using the Court's CM/ECF system, which will send notification of such filing to the following counsel of record:

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